

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: § Chapter 11
§
KALERA, INC.,¹ § Case No. 23-90290 (DRJ)
§
Debtor. §

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE AND NOTICE

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Sections 102(1) and 1109(b) of title 11 of the United States Code (the "Bankruptcy Code"), David W. Parham of Akerman LLP hereby enters his appearance in the above-referenced Chapter 11 case as counsel to Sandton Capital Solutions Master Fund V, L.P., ("DIP Lender") and hereby requests that all notices given or required in these Chapter 11 Cases, and all documents, and all other papers served in the Chapter 11 Cases, be given to and served upon the undersigned counsel listed below:

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¹ The last four digits of the Debtor's federal tax identification number is 7838. The Debtor's mailing address is Kalera, Inc., Gateway Business Center 23, 18000 East 40th Avenue, Aurora, CO 80011.

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the provisions of the Bankruptcy Code and Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronically or otherwise, which affects or pertains to the Debtors, the property of the Debtors or their Chapter 11 estates.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim or suit shall waive DIP Lender's rights (1) to have final orders in non-core matters entered only after *de novo* review by a United States District Court, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have a United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, defenses, setoffs or recoupments to which DIP Lender is, or may be, entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that the undersigned attorneys respectfully request that they be added to the official service list for notice of all contested matters, adversary proceedings and other proceedings in the Chapter 11 Cases.

Dated: April 4, 2023

Respectfully submitted,
AKERMAN LLP

/s/ David W. Parham

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*Counsel for DIP Lender, Sandton Capital Solutions
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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2023 a true and correct copy of the foregoing was served by the Court's Electronic Case Filing System to all parties of record.

/s/ David W. Parham

David W. Parham